

Schantz. Applicants respectfully request the Examiner to reconsider the claims and withdraw the rejections.

Independent claim 1 provides an automated library system having at least one robot, a secondary coil disposed on each of the at least one robots respectively and positioned to inductively couple at least a portion of an alternating current in at least one primary coil to the at least one robot, and the at least one robot comprises a drive mechanism configured to move the robot about within the automated library system. Independent claims 10 and 17 provide similar recitations. The limitation of a robot comprising a drive mechanism configured to move the robot about within an automated library system is not taught, disclosed or suggested by Miyoshi and Schantz, alone or in combination.

In particular, Miyoshi teaches a horizontal carrier that has a magnet to form a magnetic field passing through a plurality of coils that are sequentially excited to move the carrier in the moving direction. (Miyoshi, Abstract). Miyoshi further teaches a guide rail device is adapted to move the carrier by a magnetic force generated between the guide rail device and the carrier. (Miyoshi, Fig. 5 and col. 3, ll. 64-67). One of ordinary skill in the art would understand that inductively coupling, as presently claimed, is a transfer of energy from a primary coil to a secondary coil. However, Miyoshi teaches a magnetic force to move the carrier (i.e., the repulsion between the magnet 184 and the coil unit 173-1). (See, Miyoshi at col. 4, ll. 6-12). Nowhere does Miyoshi teach, disclose or suggest a robot comprising a drive mechanism configured to move the robot about within an automated library system as provided in the presently pending invention.

Schantz teaches a printhead carriage driven by a belt connected to a drive motor. (Schantz, col. 4, ll. 5-8). As such, Schantz fails to cure the deficiencies of Miyoshi. Since the cited references, alone or in combination, fail to teach, disclose or suggest the claimed invention, the Examiner has failed to make a *prima facie* case of obviousness under 35 U.S.C. § 103(a) and the rejection should be withdrawn.

Regarding claims which depend from independent claims 1, 10 and 17, Applicants contend that these claims are patentable for at least the same reasons that claims 1, 10 and 17 are patentable. Moreover, Applicants contend these claims recite further limitations, in addition to the limitations of claims 1, 10 and 17, which render these claims additionally patentable.


Applicants have made a *bona fide* effort to respond to the Examiner's rejections in advancing the prosecution of this case. Applicants believe all formal and substantive requirements for patentability have been met and that this case is in condition for allowance, which action is respectfully requested.

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The Examiner is respectfully requested to telephone the undersigned to discuss prompt resolution of any remaining issues necessary to place this case in condition for allowance.

Respectfully submitted,

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